

**UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION**

MATTHEW KOTILA, individually and on
behalf of all others similarly situated,

Plaintiff,

v.

CHARTER FINANCIAL PUBLISHING
NETWORK, INC.,

Defendant.

Case No. 1:22-cv-00704

Hon. Hala Y. Jarbou

CLASS ACTION

PLAINTIFF'S MOTION FOR PROTECTIVE ORDER

Plaintiff Matthew Kotila, individually and on behalf of all others similarly situated, respectfully moves this Court to enter a Protective Order pursuant to Federal Rule of Civil Procedure 26(c).

Per the Court's Order conditionally granting Plaintiff's Motion to Certify the Class, ECF No. 17, "Plaintiff is permitted to conduct discovery in accordance with the rules governing non-party witnesses so that Plaintiff can identify the class members for purposes of calculating damages." ECF No. 17, PageID.659 (citing *Allied Enters., Inc. v. Brillcast, Inc.*, No. 1:15-cv-749, 2015 WL 13122945, at *3 (W.D. Mich. Nov. 17, 2015) (permitting similar discovery in the context of a default)). In furtherance of these discovery efforts, certain third-parties have requested a confidentiality order be entered in this case. As such, Plaintiff files this Motion for Protective Order and moves for the Court for entry of the proposed Confidentiality Agreement and Protective Order attached hereto as **Exhibit 1**.

BRIEF IN SUPPORT OF PLAINTIFF'S
MOTION FOR PROTECTIVE ORDER

For his Plaintiff's Brief in Support, Plaintiff relies on the contents of the Motion, this Brief in Support, and the accompanying exhibit (Plaintiff's proposed Confidentiality Agreement and Protective Order).

Dated: July 25, 2023

Respectfully Submitted,

/s/ E. Powell Miller
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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on July 25, 2023, a true and correct copy of the foregoing was served by electronic service via the Court's CM/ECF service on all counsel or parties of record on the service list in the above-entitled action. I further certify that a true and correct copy of the foregoing is being sent this same date to the persons listed below via prepaid first-class U.S. Mail:

- Charter Financial Publishing Network, Inc., c/o Cogency Global, 850 New Burton Road, Suite 201, Dover, DE 19904

/s/ E. Powell Miller

E. Powell Miller